

# **EXHIBIT E**

# Mobile Data Technologies

v.

Samsung\*

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Asserted U.S. Patent No. 8,825,801

“Method, apparatus and system for management of information content for enhanced accessibility over wireless communication networks”

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## Plaintiff’s Claim Charts Exhibit E

This claim chart is based on publicly available information regarding Defendants' products. Plaintiff will be seeking Defendants' internal documentation, including without limitation technical documentation such as schematics and datasheets as well as source, in discovery and therefore Plaintiff reserves the right to amend or further supplement this claim chart in accordance with the Court's schedule and local patent rules.

The term "Accused Products" herein means the same as in the Complaint, which is hereby incorporated by reference.

This claim chart specifically addresses infringement of Claim 23 ("Asserted Claim") of the '801 Patent by Defendants' Accused Products, and merely demonstrates one way in which Defendants infringe this claim of the '801 Patent.

These charts provide representative examples of direct infringement. To the extent that the charts reference Accused Products utilized by third-parties, Plaintiff's infringement assertion is still one of direct infringement because either a single Defendant is responsible for all accused functionality, or a plurality of Defendants constitute a joint enterprise that direct or control other Defendant(s)'s performance of the accused functionality. *See, e.g., Akamai Technologies, Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020 (2015).

These charts show literal infringement. However, Plaintiff has additionally asserted infringement under the doctrine of equivalents. To the extent that the Accused Products are found to not literally infringe the express terms of the claims in suit, the elements of the Accused Products and the claimed elements of the patented invention are equivalent and Defendant infringements under the doctrine of equivalents. Plaintiff does not waive its assertions under the doctrine of equivalents.

Although Plaintiff will provide its damages information at the date set by the Court,, Plaintiff makes clear that it is also seeking damages based on convoyed sales.

Claim: 23 – Element (A)

An apparatus comprising:

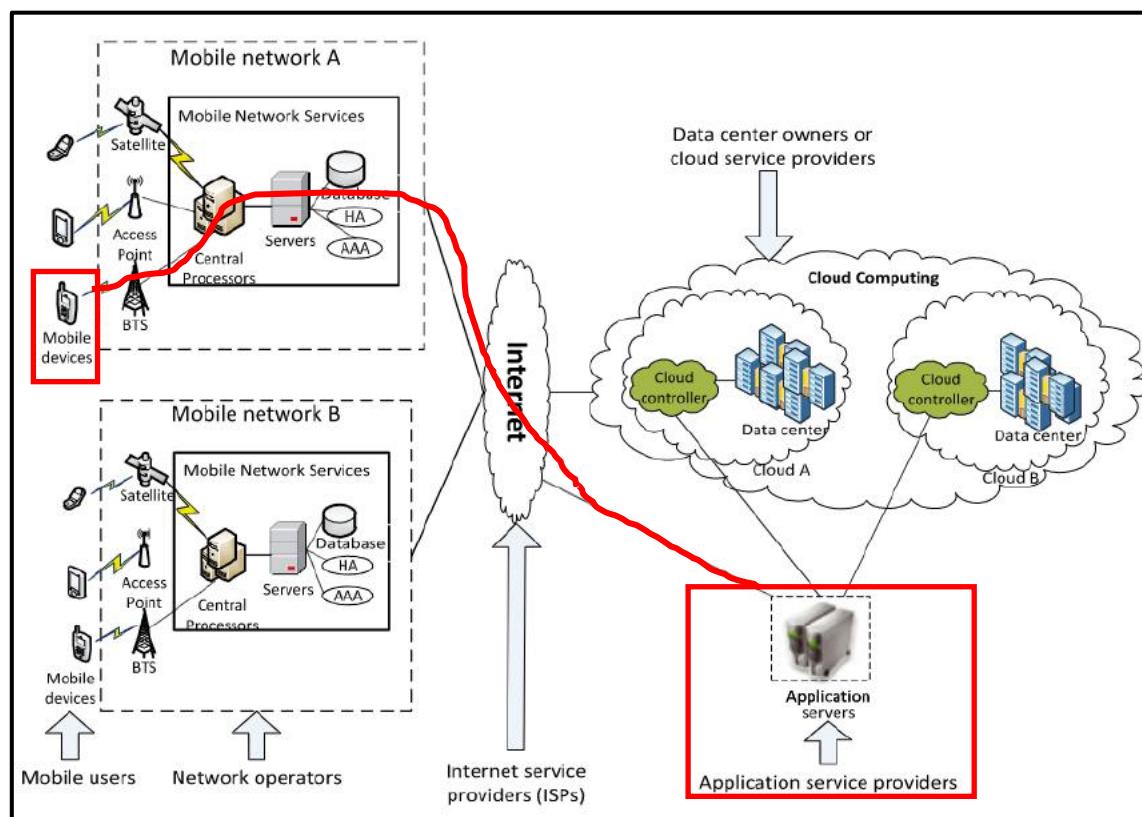
a processing element comprising a processor coupled to a memory;

- The “Samsung Members” mobile app operates from servers located at us.community.samsung.com.
- The servers at this location necessarily have a processing element that includes a processor coupled to a memory.
- The servers can connect to a plurality of mobile devices via a wireless network.



<https://www.youtube.com/watch?v=K0ySaHwhJzs>

Samsung Members: Service Features  
Date acquired: 2/13/2024



Source:

<https://onlinelibrary.wiley.com/doi/epdf/10.1002/wcm.1203>

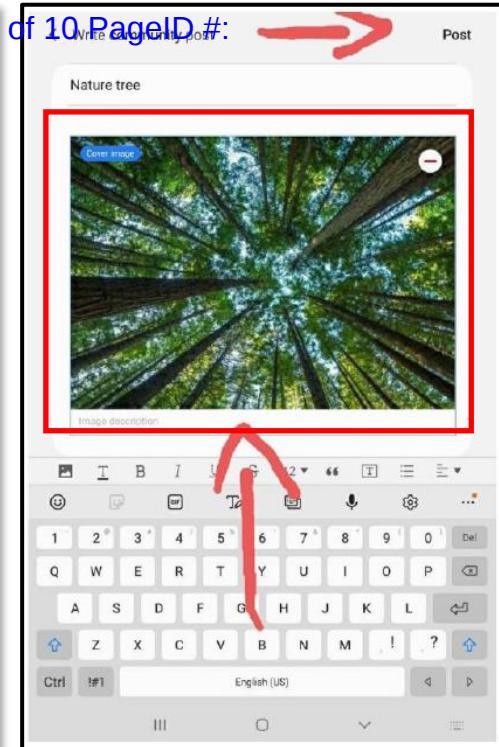
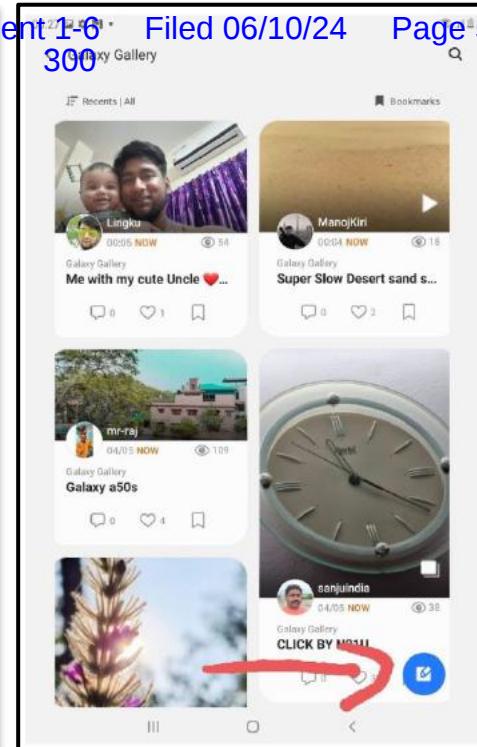
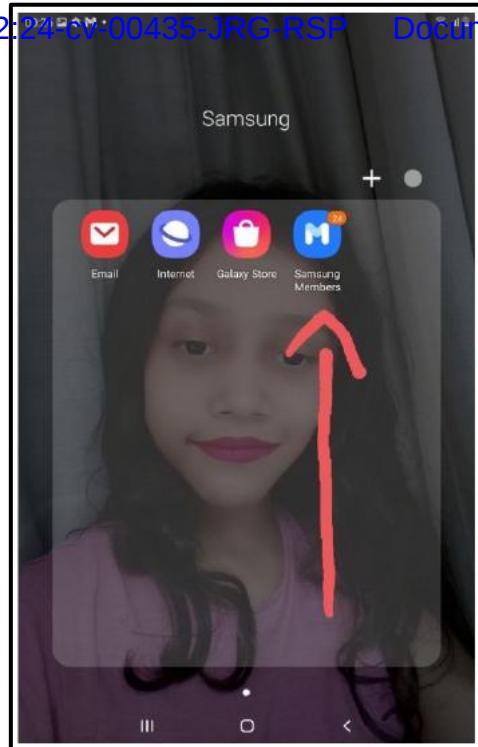
3

Claim 9, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

## Claim: 23 – Element (B)

the processing element providing at least a portion of an interface permitting a first user to control activation of a mobile information channel through which the first user can share access to content with a plurality of additional users;

- The processing element in the “Samsung Members” app server provides at least a portion of an interface that allows users to control activation of a mobile information channel (Samsung Members).
- The information channel accessed with the app “Samsung Members” allows a first user to share access to content (e.g. pictures of trees) with a plurality of users.
- The app “Samsung Members” community has almost 19 million members.



<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

## Welcome to the Samsung Members Community

Explore your new hub for all things Samsung and beyond. Connect with Samsung experts, super-fans, and other Community members for tips on features and how to get the most out of your Samsung product.

Search all content



MEMBERS	TOPICS	SOLUTIONS	ONLINE
18,883,993	21,172	16,035	98,364

[https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent\\_topics](https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent_topics)

Welcome to the Samsung Members Community

Date acquired: 2/12/2024

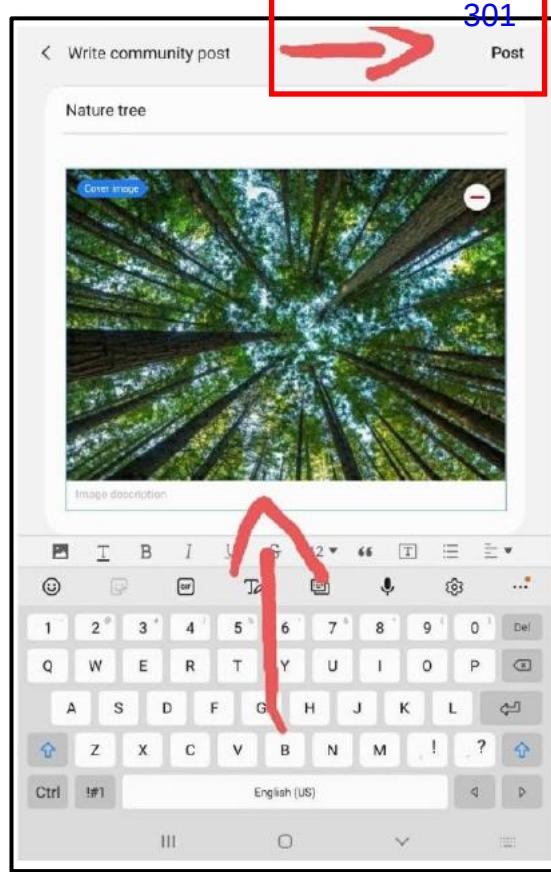
Claim 9, Element (B) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C1)

the processing element being configured to:

activate the mobile information channel responsive to input received from the first user via the interface;

- The processing element in the “Samsung Members” app server is configured to activate the mobile information channel, responsive to input received from the first user.
- As shown previously, a new thread (mobile information channel) is created (activated) when a user clicks the “post” button.
- At right is an original post titled “Burj Khalifa.” This post is an information channel that was activated by user Tom383 after inputting information into his Samsung phone.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

<https://r2.community.samsung.com/t5/Tech-Talk/How-to-post-on-Samsung-Members/td-p/8220552>

Original topic: How to post on Samsung Members

Date acquired: 2/12/2024

Claim 9, Element (C1) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C2)

insert content provided by the first user into the mobile information channel;

- The processing element in the “Samsung Members” app server is configured to insert the integrated content item (photo and information) into the mobile information channel (Burj Khalifa thread in Samsung Members Community).
- The content is provided by the first user (Tom383).



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 9, Element (D) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C3)

receive additional content relating to the mobile information channel from one or more of said additional users via one or more respective mobile devices associated with at least one wireless network;

- The processing element in the “Samsung Members” app server is configured to receive additional content (photos, comments) relating to the mobile information channel (Burj Khalifa thread in Samsung Members Community) from additional users (Lucasinrdr2 and jvudcoo).

- The users provide the content via a Samsung mobile device, which necessarily is associated with at least one wireless network.

Lucasinrdr2 Star  
12-13-2023 12:09 PM (Last edited 12-13-2023 02:43 PM ) in Creator  
Very COOL! never seen it before

jvudcoo Galaxy  
12-13-2023 01:31 PM in Creator

Allow me to add my burj khalifa shot as well.

angelchained Comet  
an hour ago (Last edited an hour ago ) in Creator  
Gorgeous 😍 Thanks for sharing!!! Incredibly amazing.

<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa  
Date acquired: 2/12/2024

Claim 9, Element (D2) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (C4)

insert at least a portion of the additional content into the mobile information channel; and

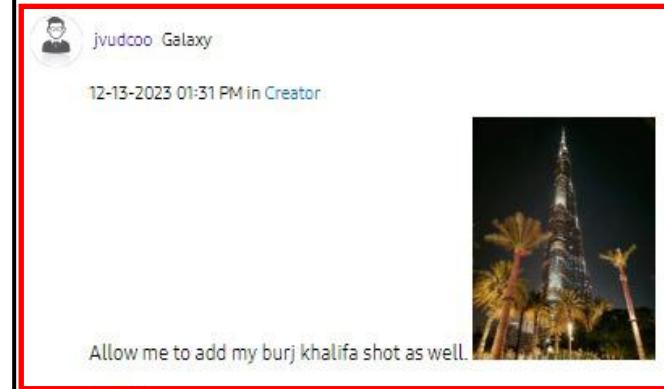
- The processing element in the “Samsung Members” app server is configured to insert the additional content (photos, comments) into the mobile information channel (Burj Khalifa thread in Samsung Members Community).

Replies Document 1-6 304

Lucasinrdr2 Star  
12-13-2023 12:09 PM (Last edited 12-13-2023 02:43 PM ) in Creator  
Very COOL! never seen it before

REPLY

jvudcoo Galaxy  
12-13-2023 01:31 PM in Creator



Allow me to add my burj khalifa shot as well.

REPLY

angelchained Comet  
an hour ago (Last edited an hour ago ) in Creator  
Gorgeous 😍 Thanks for sharing!!! Incredibly amazing.

REPLY

<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa  
Date acquired: 2/12/2024

Claim 9, Element (D2) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 23 – Element (D2)

integrate into the mobile information channel information associated with at least one wireless networking functionality of said at least one wireless network.

- The processor is configured to integrate information associated with at least one wireless networking functionality (messaging action) of said at least one wireless network.

- As shown, the processing element in the “Samsung Members” app server can integrate information (e.g. username, date, time, Group) that is associated with a messaging action performed by a user (Tom383) while messaging other users via the Samsung Members Community.

12-13-2023 12:06 PM in Creator

I photographed the Burj Khalifa

<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Advantageously, the information content of a given mobile site generated in the system 10 may be configured so as to integrate therewith information associated with at least one wireless networking functionality of the wireless network 12. This information may be determinable based at least in part 55 on one or more parameters associated with the above-noted mobile information channels or M-channels. Examples of such information include information specifying at least one messaging action implementable over the wireless network, information specifying at least one collaboration action 60 implementable over the wireless network, and information specifying at least one location-based service action implementable over the wireless network. Other types of information associated with wireless networking functionalities may also or alternatively be used. 65

9,032,039 patent at 5:55-65

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Claim 9, Element (D2) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.